



## **PROGRESS REPORT NO. 134**

**TO:** Monica Tonel, U.S. Environmental Protection Agency (EPA) – via Email  
Kathryn Cerise, EPA – via Email

**FROM:** Kris McCaig – Teck American Incorporated (TAI)

**DATE:** September 11, 2017

**FILE NO:** 01-773180-000

**RE:** Upper Columbia River (UCR) Remedial Investigation/Feasibility Study  
(RI/FS) - Progress Report No. 134 Month Ending August 2017

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Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of activities completed during the past month in compliance with the aforementioned Agreement. It is also intended to provide a brief summary of pending and on-going activities.

Sediments – TAI is in receipt of a letter from EPA dated May 23, 2017 in which EPA describes EPA's approach to the sediment bioassay analysis and a summary of EPA's current understanding of sediment and sediment toxicity conditions in the UCR. The letter was reviewed by TAI in preparation for the sediments technical meeting that was held on June 7, 2017. Follow-up actions coming out of the meeting are being conducted by TAI's technical team in preparation for the next technical meeting that has been scheduled for October 26, 2017.

Benthic Macroinvertebrate Tissue Study – All validated data with location information were submitted to EPA by July 14, 2017. TAI continued work on the draft data summary report (DSR) during the month of August and will submit the report to EPA by the due date of September 14, 2017.

Recreation Consumption and Resource Use Survey – EPA provided the Draft Final Data Analysis Report (DAR) for the Recreational Use Survey to TAI on April 15, 2016 and TAI submitted review comments to EPA on June 10, 2016. On July 31, 2017 EPA provided a memorandum *Draft Response TAI Comments on the Draft Final Data Analysis Report for the Recreational Use Survey, Dated 6/10/16* to TAI for review and initial discussion during a human health risk assessment (HHRA) technical call on August 1, 2017. A second conference call between EPA and TAI was held on August 28, 2017 to further discuss EPA's draft response to comments.

Tribal Consumption and Resource Use Survey – On June 27, 2016 EPA submitted the April 30, 2016 report titled “Statistical Review of a Report on Food Consumption and Resource Use among Residents of the Colville Reservation” as prepared by The Mountain-Whisper-Light Statistics for TAI to review and provide comment. TAI provided review comments to EPA on September 26, 2016. EPA’s plan for revising the document was discussed during the May 11-12, 2017 HHRA meeting.

2016 Residential Soil Sampling – TAI submitted the draft final version of the 2016 Residential Soil Study DSR to EPA for review on September 1, 2017. The report was revised in response to EPA’s final comment received via electronic mail on July 31, 2017. On September 5, 2017 TAI received a letter from EPA approving the draft final DSR.

White Sturgeon Sediment Toxicity Study – In January 2014 TAI submitted to EPA, the draft final version of the Assessment of Sediment Toxicity to White Sturgeon Data Summary Report (DSR) and response to EPA’s comments. On August 10, 2015 TAI met with EPA to discuss the draft final DSR and TAI’s response to comments and clarify further changes needed in order to revise the DSR. TAI submitted a revised DSR and revised response to comments to EPA on November 20, 2015. On August 23, 2017 EPA provided a letter summarizing EPA’s determination of the Data Usability of various data sets that will be used for the baseline ecological risk assessment (BERA) including the White Sturgeon Sediment Toxicity Study. TAI is currently reviewing and evaluating the letter.

Soil Amendment Technologies Evaluation Study (SATES) – The Final Work Plan for the SATES Phase 1: Test Plot Characterization and Initial Amendments Alternatives Evaluation was submitted to EPA on August 4, 2017. Permits were obtained by TAI and the Phase 1 field work was conducted from August 15-22, 2017. Samples were submitted to the analytical laboratory and analyses began during the month.

White Sturgeon Fillet Tissue Study DSR – TAI received a letter from EPA dated July 19, 2017 providing approval of the Draft Final 2017 White Sturgeon Tissue Study DSR and distributed the Final DSR to EPA and full distribution list on August 24, 2017.

Plant Tissue Study – EPA approved the draft final Field Reconnaissance Plan on August 9, 2017 and the document was finalized for use during field reconnaissance work completed during the week of August 14, 2017.

BERA – On August 14, 2017 EPA provided TAI with an informal document via electronic mail outlining EPA’s proposed approach from streamlining the BERA. The approach suggested that we identify and complete interim deliverables that focus on specific assessment endpoints. TAI is currently reviewing and evaluating the document. TAI is in receipt of a letter from EPA dated August 23, 2017 regarding EPA Review and Determination of Data Usability for Upper Columbia River Remedial Investigation BERA. TAI is currently reviewing and evaluating the letter. A porewater workgroup was

formed between TAI and EPA technical team members for the purpose having an open dialog directed at developing recommendations about how to use UCR porewater as part of the overall metals risk assessment for the RI/FS. Work continued during the month of August with a workgroup call that was held on August 24, 2017.

HHRA – A meeting was held between EPA and TAI on May 11 and 12, 2017 to discuss several topics EPA is working on to support the HHRA. Action items were identified and EPA and TAI agreed to have monthly conference calls to continue discussion around addressing action items identified during the May meeting. The second HHRA call was held on August 1, 2017.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-623-4501.